

Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:
SENATE STAFF OFFICE
17 JUN -9 PM 3:59

Post-Travel Filing Instructions: Complete this form within 30 days of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building.**

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

- ☒ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

AIEF

Private Sponsor(s) (list all):

Travel date(s): 5/6/17 - 5/14/17

Name of accompanying family member (if any):

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING DID NOT INCREASE DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate	\$6,722.75	\$1,971	\$890.90	\$3,003
<input checked="" type="checkbox"/> Actual Amount				

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
<input type="checkbox"/> Good Faith Estimate				
<input type="checkbox"/> Actual Amount				

Provide a description of all meetings and events attended. See Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): Attached

6/8/17
(Date)

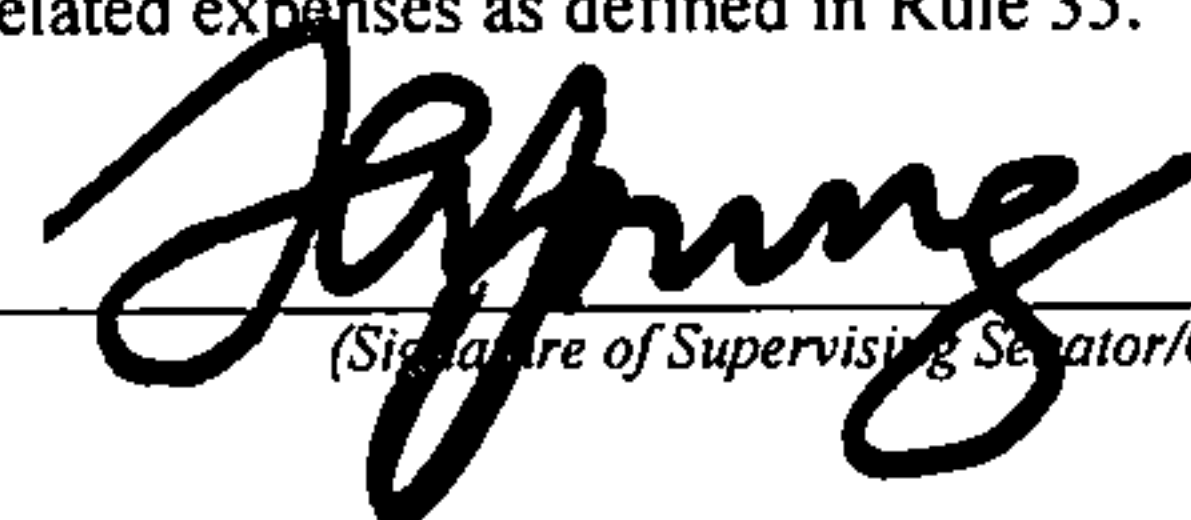
John Connell
(Printed name of traveler)


(Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

6/8/17
(Date)


(Signature of Supervising Senator/Officer)

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics in SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: John Connell

Employing Office/Committee: Senator Todd Young

Private Sponsor(s) (list all): AIEF

Travel date(s): May 6 - 14, 2017

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): Israel

Explain how this trip is specifically connected to the traveler's official or representational duties:

The purpose of this trip is to explore critical foreign policy and national security challenges facing both Israel and United States, including discussions with Israeli government officials, military officers, members of the Knesset, U.S. officials, Palestinian representatives and leading academics and journalist. With Senator Young Serving on the Foreign Relations Committee, this educational trip will help me advise the Senator on Middle East Policy issues before the Foreign Relations Committee, which are issues that fall within my area of responsibility as Senator Young's Chief of Staff.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

4/6/17
(Date)


(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator Todd Young hereby authorize John Connell
(Print Senator's/Officer's Name) (Print Traveler's Name)

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. (signify "yes" by checking box) ☐

4/6/17
(Date)


(Signature of Supervising Senator/Officer)

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

1. Sponsor(s) of the trip (please list all sponsors):
American Israel Education Foundation (AIEF)
2. Description of the trip: Please see attached
3. Dates of travel: May 6-14, 2017
4. Place of travel: Israel
5. Name and title of Senate invitees: Please see attached
6. I *certify* that the trip fits one of the following categories:
☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.
– OR –
☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) (*see question 9*).
7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.
– AND –
☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.
8. I *certify* that:
☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.
– AND –
☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**

I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and one overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

– OR –

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and two overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10*).

– OR –

☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**

If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

n/a

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

AIEF is solely responsible for recruiting, coordinating, executing, and funding all aspects of this trip.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

AIEF is a non-profit 501(c)(3) organization with the mission of providing educational programming about the U.S.-Israel relationship.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

Please see attached

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

Please see attached

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
<input checked="" type="checkbox"/> Good Faith estimate	\$6,811	\$1,986	\$847.22	\$2,775.69
<input type="checkbox"/> Actual Amounts				breakdown attached

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation or b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

The trip involves an event that is arranged or organized specifically with regard to congressional participation.

18. Reason for selecting the location of the event or trip

The trip will take place in Israel in order to educate congressional staff about the U.S.-Israel relationship.

19. Name and location of hotel or other lodging facility:

Mamilla Jerusalem, Sheraton Tel Aviv, Galei Kinneret Tiberias

20. Reason(s) for selecting hotel or other lodging facility:

We chose these hotels due to their location and affordability.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

Please see attached

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

Participants will fly business class on a commercial airline

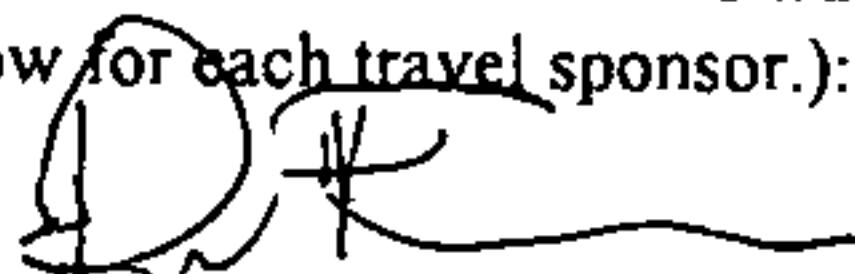
23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

n/a

25. I hereby *certify* that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel sponsor.):

Signature of Travel Sponsor:



Name and Title: Richard Fishman, Executive Director

Name of Organization: American Israel Education Foundation (AIEF)

Address: 251 H Street NW, Washington DC 20001

Telephone Number: (202) 639-5233

Fax Number: n/a

E-mail Address: rfishman@aiefdn.org

**American Israel Education Foundation (AIEF)
Educational Seminar in Israel
U.S. Senior Congressional Staff
May 6 – 14, 2017**

Senate Invitees

1. Allyson Bell, Chief of Staff, Sen. Mike Lee (R-UT)
2. Brennen Britton, Chief of Staff, Sen. Jerry Moran (R-KS)
3. John Connell, Chief of Staff, Sen. Todd Young (R-IN)
4. Christine Gleason, Senior Strategist, Sen. Chris Coons (D-DE)
5. Chris Lynch, Chief of Staff, Sen. Benjamin Cardin (D-MD)
6. Helen Tolar, Chief of Staff, Sen. John Boozman (R-AR)

**American Israel Education Foundation (AIEF)
Educational Seminar in Israel
Senior Congressional Staff
May 6-14, 2017, 2017**

Addendum

2. Description of the Trip

This seminar, which will be on the ground in Israel for seven days, is specifically designed to explore foreign policy and defense issues related to the U.S.-Israel relationship. Some of the key issues to be addressed include: the status of Iranian compliance with the Joint Comprehensive Plan of Action, and Iran's continued malign regional activities; the impact of Syrian civil war along Israel's northern border; the internal political situations of both Israel and the Palestinian Authority, the status of the peace process; and the expanded cooperation between the U.S. and Israel in fighting terrorism and proliferation.

The seminar will consist of discussions with Israeli government officials, military officers, Members of the Knesset, Palestinian representatives and U.S. officials, as well as site surveys of the northern border with Lebanon and Syria, the southern border with the Gaza Strip, and the security fence. The seminar also aims to provide the political, historic, and religious context to the current conflicts and issues facing Israel and the region. It will explore the connection the three monotheistic religions have with the land and the influence this connection has on today's struggles. In addition to formal meetings and briefings, the trip provides experiential opportunities to help better understand the geographical complications, the security implications, and the historic root causes of the current conflicts.

14/15. Sponsor Information

Founded in 1990, the American Israel Education Foundation (AIEF) is the charitable organization affiliated with AIPAC, America's pro-Israel lobby. The Foundation's fundamental purpose is to maintain and further the relationship between the U.S. and Israel. AIEF works to inform the public about Israel and the importance of the U.S.-Israel relationship, to expand public awareness about issues affecting the Middle East, and to encourage participation in public affairs, especially by young people. AIEF grants support innovative and award-winning programming that educates a wide array of participants, including college students, members of Congress and their staff, and political professionals.

AIEF funds Israel Seminars for members of Congress, Capitol Hill staffers, students, political consultants, as well as religiously motivated pro-Israel Christian, Latino and African American leaders. These trips to Israel are among the most critical programs AIEF supports on behalf of the U.S.-Israel relationship. These educational seminars allow policy makers to understand the complex historical, religious and geographic context of the Arab-Israeli conflict. Participants have the opportunity to meet with Israeli government officials, military officers, members of the Knesset, U.S. government officials, Palestinian Authority officials and leading academics and journalists. For many of the participants, who make important decisions impacting Israel and the Middle East, these trips are their first, and sometimes, only exposure to the country.

16. Other Expenses

Security: \$888.89 per person

-AIEF considers the security of its trip participants as its highest priority. A security team accompanies all participants throughout the trip.

Speaker Fees: \$500 per person

-Honoraria for guest speakers

Travel Agency Commission: \$419 per person (single occupancy)

-AIEF pays an upcharge of 21% per room per night, split between our U.S. and Israeli travel vendors

Tour Guide: \$212.22 per person

-As a detailed historical understanding is crucial to maximizing the educational aspect of the trip, a licensed tour guide accompanies the group throughout the trip.

Hotels for contract staff (tour guide, bus driver, security guards): \$205.56 per person

Meals for contract staff and speakers: \$177.78 per person

Room Rentals: \$166.67 per person

-The cost of renting rooms at hotels and restaurants for meetings and meals with speakers.

Transportation for individualized tour of Syrian/Israel border: \$66.67

Other: \$61.12 per person

-Briefing materials, miscellaneous

Entrance Fees: \$55.56 per person

-Several sites require an entrance fee, including the southern Western Wall excavations and the holy sites around the Sea of Galilee.

Tips: \$22.22 per person

-It is customary to tip the driver and tour guide that accompany trip participants.

21. Per Diem

The three hotel rates are within the international per diems for Israel. The estimate for meal expenses includes the cost for meals, snacks, and water. It does not include alcohol, as we do not pay for alcohol per Senate ethics rules.

**American Israel Education Foundation (AIEF)
Educational Seminar in Israel
U.S. Senior Congressional Staff
May 6 – 14, 2017**

FINAL Itinerary

Saturday, May 6, 2017

5:00 PM Depart DCA

6:27 PM Arrive JFK

10:31 PM Depart JFK

Sunday, May 7, 2017

4:15 PM Arrive at Ben-Gurion Airport
Transfer to Jerusalem
Check into the Mamilla Hotel

7:00 PM Depart hotel

En route:
Shalom Jerusalem: Introduction to the History of the City

7:45 PM *Setting the Stage*
Welcome and orientation
- at Touro

8:15 PM *State of the Nation*
Dinner with David Horovitz
Founding Editor, The Times of Israel
- at Touro

10:15 PM Overnight at the Mamilla Hotel

Monday, May 8, 2017

7:45 AM Breakfast is served
- at the hotel, Meeting Room AB

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8:00 AM *Israel's Political Map*
Breakfast with Prof. Reuven Hazan
Department of Political Science
The Hebrew University of Jerusalem
- at the hotel, Meeting Room AB

9:15 AM Depart for Strategic Survey of Jerusalem

9:30 AM *Strategic Survey of Jerusalem, Part I: The Old City and Holy Basin*

12:30 PM Depart for Knesset

1:00 PM Security Check

1:15 PM *Israeli Democracy in Action*
Lunch and meeting with Members of Knesset

- The Honorable Yehiel Bar, Zionist Union Party
- The Honorable Anat Berko, Likud Party

- at the Knesset

2:45 PM Depart

3:15 PM *Strategic Survey of Jerusalem, Part II:
Post-1967 Neighborhoods and the Security Barrier*

4:30 PM Depart

5:00 PM *Israel-Palestinian Authority Relations: An Update*
Meeting with Dr. Tal Becker
Acting Legal Adviser
Ministry of Foreign Affairs
- at the hotel, Meeting Room AB

7:30 PM Depart for dinner

7:45 PM *The Israeli Mosaic*
Dinner with:

- Tziona Koenig-Yair, Former National Commissioner, Equal Employment Opportunities Commission
- Sally Oren, Goodwill Ambassador, IsraAID
- Kalman Samuels, Director, Shalva Children's Center
- Dan Slyper, LGBT Caucus, Yesh Atid Party

- at La Guta

9:45 PM Overnight at the Mamilla Hotel

Tuesday, May 9, 2017

7:30 AM Breakfast is served

7:45 AM *Minority Rights in Israel*
Breakfast with Ghaida Rinawi-Zoabi
General Director, INJAZ – Center for Professional Arab Local Governance
- at the hotel, Meeting Room AB

8:45 AM Depart for Ramallah

10:00 AM *A View from the Palestinian Authority*
Meeting with:
▪ Dr. Saeb Erekat, Head of Negotiation Affairs Department, Palestinian Authority
▪ Javier Obied, Legal Advisor, Palestinian Authority
- at PLO-NSU Headquarters

11:00 AM Depart for Yad Vashem

12:00 PM Lunch at Yad Vashem

12:45 PM *Remembering the Victims of the Holocaust*
Visit to Yad Vashem Holocaust Memorial and Museum

3:00 PM Depart

3:15 PM *A View from the Prime Minister's Office*
Meeting with David Keyes
Communications Advisor and Foreign Press Liaison, Prime Minister's Office
- at the Crowne Plaza Hotel, Kerem Carmit Hall

4:15 PM Depart for Tel Aviv

5:30 PM Check into the Sheraton Tel Aviv

7:00 PM Depart for dinner

- 7:30 PM *Start-Up Nation*
 Dinner with:
- Karin Kloosterman, Founder, Eddy
 - Dov Maisel, Chief Operating Officer, United Hatzalah
 - Alon Metrikin-Gold, Director of Education, MobileOD
 - Udi Remer, Director of Business Development, Mobileye
- at Spoons
- 10:30 PM Overnight at the Sheraton Tel Aviv Hotel

Wednesday, May 10, 2017

- 7:00 AM Breakfast on own
 - at the hotel, Main Dining Hall
- 7:45 AM Depart for Israel's South
- 8:30 AM *Save a Child's Heart – Cardiac Care for Children*
 Visit to Wolfson Medical Center followed by a visit to the Children's
 Rehabilitation Home
- 10:30 AM Depart
- 11:30 AM *The Desalination Era*
 Visit to Granot Desalination Plant
 Briefing with Dr. Sarit Bason
 Desalination Unit
- 12:30 PM Depart
- 1:00 PM Lunch
 - at Netachim
- 1:45 PM Depart
- 2:00 PM *Israel's Southern Front*
 Briefing at Overlook into the Gaza Strip
 - at Kibbutz Nir-Am
- 3:00 PM *Living in the Shadow of Rockets*
 Visit to Kibbutz Kfar Aza with Chen Kotler-Abrahams, local resident
- 4:00 PM Depart

4:30 PM *Israel's Missile Defense System*
Visit to an Iron Dome Battery

5:00 PM Depart for Tel Aviv

6:15 PM *360° Bird's Eye View of Israel*
Briefing at the Azrieli Center Rooftop

6:45 PM Depart, return to hotel

8:00 PM Depart for Dinner

8:15 PM *Regional Strategic Briefing: Syria and Iraq*
Dinner with Dr. Jonathan Spyer
Director, Rubin Center, IDC Herzliya
- at Lumina

10:15 PM Overnight at the Sheraton Tel Aviv Hotel

Thursday, May 11, 2017

7:45 AM Breakfast is served
- at the hotel, Topaz Hall

8:00 AM *Regional Threat Assessment*
Breakfast with Brig.-Gen. (Res.) Nitzan Nuriel
Immediate Past Director, Counter Terrorism Unit, Prime Minister's Office
- at the hotel, Topaz Hall

9:30 AM Depart

10:30 AM *Israel's Narrow Waistline – Strategic Concerns*
Briefing at Alfei Menashe

11:30 AM Depart

En route:

- *The Jezreel Valley – the Strategic Land Bridge Between Asia and Africa*
- *Upper Galilee – Potential for Development*

1:30 PM Lunch
- at Hummus Eliyahu, Rosh Pina

2:30 PM *Treating the Victims of Syria's Civil War*
Visit to Ziv Medical Center, Tsfat

3:45 PM Depart

4:15 PM *Northern Exposure, Part I: Hezbollah Next Door*
Briefing with Lt.-Col. (Res.) Sarit Zehavi
Intelligence Officer, Northern Command
- at Mt. Adir

5:15 PM Depart

6:00 PM Check into Galei Kinneret Hotel, Tiberias

7:15 PM Depart for dinner

7:30 PM *Reflections on the Week*
Dinner and Discussion
- at Decks

9:30 PM Overnight at Galei Kinneret Hotel

Friday, May 12, 2017

7:45 AM Breakfast on own
- at the hotel, Main Dining Hall

8:30 AM Depart hotel

9:00 AM *Historical Significance of the Sea of Galilee*
Visit to historical and religious sites around the Sea of Galilee

- Mt. of Beatitudes
- St. Peter's Church
- Capernaum

11:00 AM Depart, travel up the Golan Heights

12:00 PM *Northern Exposure, Part II: Strategic Survey of Israel's border with Syria*
Briefing with Cpt. (Res.) Ilan Schulman
- at Kibbutz Ein Zivan

1:30 PM Lunch
- at Habokrim

2:45 PM Depart
Travel back to Jerusalem via the Jordan Valley

En route:
Israel's Relations with the Hashemite Kingdom of Jordan

6:00 PM Check into the Mamilla Hotel

7:15 PM Depart for dinner

7:30 PM *Reflections on the Sabbath in Jerusalem*
Traditional Sabbath dinner hosted by Professor Gil Troy and his family
- at their home in Jerusalem

9:30 PM Overnight at the Mamilla Hotel

Saturday, May 13, 2017

8:00 AM Breakfast on own
- at the hotel, Main Dining Hall

8:30 AM Depart

En route:
The Dead Sea Region – Environmental Concerns
▪ *Jericho Road and the E-1 Corridor – Strategic Concerns*

10:00 AM *History and Geopolitics of the Roman Empire*
Survey of Masada National Park

12:00 PM Depart

12:30 PM *Exploration of the Dead Sea Region*
Lunch
- at Hod Hotel

2:30 PM Depart for Jerusalem

4:00 PM Return to hotel and pack for departure
Luggage in the lobby
Check out

5:45 PM Depart for closing dinner

6:00 PM *The U.S-Israel Relationship: Bringing it all Together*
- at Cielo

8:00 PM Depart for the airport

Sunday, May 14, 2017

12:15 AM Depart Tel Aviv

5:13 AM Arrive JFK

8:50 AM Depart JFK

10:23 AM Arrive DCA (Christina Gleason returns Wilmington, DE)

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United States Senate

SELECT COMMITTEE ON ETHICS

April 21, 2017

John Connell
Office of Senator Todd Young
United States Senate
Washington, DC 20510

Dear Mr. Connell:

This responds to your recent correspondence concerning an invitation you received to travel to an educational seminar in Israel on May 6-14, 2017, sponsored by the American Israel Education Foundation (AIEF). AIEF certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*¹ related to the travel and that it is neither a lobbyist, nor lobbying firm, nor agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. AIEF has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal, and that no registered lobbyist will accompany you at *any point throughout your trip*.²

Based on information and materials available to the Committee, and assuming the **actual** travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, AIEF is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel*

¹ The term "necessary expenses" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

² The term "any point throughout your trip" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2.

Certification Form, and all relevant attachments (e.g., the private sponsor's invitation and itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel.**

The Committee has determined that § 501(c)(3) non-profit organizations that are classified as private foundations, as opposed to public charities, may not pay for transportation from the United States to a foreign country.³ However, AIEF represented to the Committee that it is a § 501(c)(3) public charity, as opposed to a private foundation, pursuant to the Internal Revenue Code.⁴

Please be advised that the United States Constitution prohibits the acceptance of any gift, including a meal, from a foreign government without the consent of Congress. In the Foreign Gifts and Decorations Act (FGDA), Congress consented to the acceptance by federal government officials of: (1) gifts of minimal value and (2) travel or the expenses for travel taking place entirely outside the United States, from a foreign government (which includes those acting as a representative or agent of a foreign government).⁵ The Senate has defined minimal value as \$100 or less. Further, pursuant to FGDA, there are certain reporting and procedural requirements that are imposed upon Members, officers, and employees who accept gifts from a foreign government. Please review the Committee's "Dear Colleague" letter of January 9, 2015 setting forth the items to be included in filing that report.

Finally, Senate Rule 34 requires a reporting individual,⁶ on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed \$390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

³ See 26 U.S.C. § 4941 et seq. Section 501(c)(3) of the Internal Revenue Code broadly defines non-profit, charitable, tax-exempt organizations. These § 501(c)(3) organizations are then further defined or designated as "public charities" and "private foundations."

⁴ 26 U.S.C. § 501(c)(3).

⁵ 5 U.S.C. § 7342.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$124,406 for CY 2017) or is a political fund designee and is required to file Financial Disclosure Reports.